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HARRIS CORPORATION

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March 26, 2015

Via Federal Express Overnight Delivery

U.S. Environmental Protection Agency
Leslie Patterson, Remedial Project Manager
77 West Jackson Boulevard (SR-6J)
Chicago, IL 60604-3590

Re: Response to Special Notice Letter for the South Dayton Dump & Landfill Site in Moraine, Ohio ("Site"), dated January 16, 2015 ("Notice")

Dear Ms. Patterson:

Please accept this letter as the response of Harris Corporation ("Harris") to the above-referenced Notice. By email correspondence, Thomas Nash, of USEPA, confirmed that Harris could have until March 27, 2015 to respond to the Notice.

Harris has conducted several diligent searches of corporate records and has not located any information related to the Site or the disposal of any hazardous substances at the Site. Neither EPA nor the plaintiffs in the current litigation involving the Site, *Hobart Corporation, et al., v. The Dayton Power and Light Company et al.*, Case No. 3:13-cv-00115 ("Hobart v. Dayton Power and Light litigation"), in which Harris is named as a co-defendant, has provided information sufficient to show that Harris is potentially liable for the contamination at the Site.

Accordingly, Harris respectfully declines to negotiate a consent order to conduct or finance the remedial investigation and feasibility study for the Site or to reimburse EPA for its costs incurred to date. However, in the event any new, relevant information is discovered, Harris would be open to revisiting this matter. Solely to address the nuisance value of this matter and obtain statutory protection from the litigation associated with the Site, Harris may be interested in a de minimis buyout if and when such an option were available and if the terms of the buyout agreement were acceptable.

Regards,

Jennifer M. Black
Senior Counsel, Corporate

cc: Thomas Nash, Esq., USEPA